

05 - 464

Principles

1) Defendant - Stanley M. Taylor, is employed as the Commissioner of Persons. His responsibilities include adopting General Assembly guidelines and establishing rules and regulations that will have mandatory enforcement within the Department of Corrections. Address: 245 McKee Road, Dover, Delaware 19904. He is being sued in his individual and official capacities.

2) Defendant - Vincent Bianco, is employed as the warden of the Morris Correctional Institution (M.C.I) and, the warden of the Central Violation of Probation Facility (CVP). He is responsible for the overall supervision of staff and residents, discipline and rules and regulations enforcement of both facilities. Address: 300 Waters Street, Dover, Delaware 19901. He is being sued in his individual and official capacities.

3) Defendants - Bill Elio, Ms. Moore and John Doe are employed at the Morris Correctional Institution in various individual capacities. Collectively their responsibilities include, the Multi-Disciplinary Team (M.D.T Board). They are the sole members of the Board and they collectively decide guilt or innocence of a rule infraction, set forth sanctions. Address: 300 Waters Street, Dover, Delaware 19901. They are being sued in their individual and official capacities.

- 4) Defendant - Adonis T. Bennible is employed as a Lieutenant at C-VOP. He is immediately responsible for the overall operations of the facility and the safety of all residents. Address: 875 Smyrna, Landing Road, Smyrna, Delaware 19977. He is being sued in his individual and official capacities.
- 5) Defendant - Michael Records, is employed at C-VOP as the Head Supervisor of Resident Probation Officers. His responsibilities include scheduling transfers of residents to other facilities in accordance with laws and rules and regulations of the Department of Corrections. Address: 875 Smyrna Landing Road, Smyrna, Delaware 19977. He is being sued in his individual and official capacities.
- 6) Defendant - Cline Daniels, is employed a C-VOP as a records Clerk. His responsibilities include reviewing and maintaining adequate records of sentencing orders in accordance with laws and rules and regulations of the Department of Corrections. Address: 875 Smyrna Landing Road, Smyrna, Delaware 19977. He is being sued in his individual and official capacities.
- 7) Defendant - Cindy Gaita, is employed a C-VOP as a resident Probation Officer. Her responsibilities include assisting residents with all matters pertaining to their confinement / sentence. Address: 875 Smyrna Landing Road, Smyrna, Delaware 19977. She is being sued in her individual and official capacities.

- 8) Defendant Bob George, is employed at Sussex Institution at Probation (S.I.P.) as the warden of the facility. His responsibilities include the overall supervision, discipline and safety of the facility and residents. Address: P.O. Box 500, Georgetown, Delaware 19947. He is being sued in his individual and official capacities.
- 9) Defendant - Michael Costello, is employed at S.V.P. as Security Chief his responsibilities include screening every resident and security issue of the facility. Address: P.O. Box 500, Georgetown, Delaware, 19947. He is being sued in his individual and official capacities.
- 10) Defendant Barbara Costello, is employed a S.V.P. as a transfer officer. Her responsibilities include scheduling residents transfers to other facilities as well as screening orders of residents accepted into the facility. Address: P.O. Box 500, Georgetown, Delaware 19947. She is being sued in her individual and official capacities.
- 11) Defendant Department of Corrections, is employed by the State of Delaware to provide security for its prison population. Their responsibilities include following the laws of this state and U.S. Constitution. Address: 2415 McKee Road, Dover, Delaware 19904. They are being sued in their individual and official capacities.

All the Defendants have acted and continue to act, under the color of state law at all times relevant to this complaint.